

REMARKS

Claims 1-31 are currently pending in the subject application and are presently under consideration. Claims 1, 13, 18, 30 and 31 have been amended as shown on pp. 2-6 of the Reply. Claim 29 has been canceled.

Applicants' representative thanks the Examiner for the courtesies extended during the teleconference of March 6, 2007.

Since the amended limitations merely emphasize subject matter as originally claimed, these limitations should already have been considered during an initial search in connection with the subject application. Pursuant to MPEP §714.13, applicants' representative submits that the amendments to these claims "only requires a cursory review by the Examiner" and thus, entry and consideration thereof is respectfully requested.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claim 29 Under 35 U.S.C. §101

Claim 29 stands rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claim 29 has been canceled, as such the rejection is moot and should be withdrawn.

II. Rejection of Claims 1-6, 12-16, 18-19, 26 and 29-31 Under 35 U.S.C. §102(e)

Claims 1-6, 12-16, 18-19, 26 and 29-31 stand rejected under 35 U.S.C. §102(e) as being anticipated by Charlet, *et al.* (US 2005/0160108). Applicants' representative respectfully requests that this rejection be withdrawn for at least the following reasons. Charlet *et al.* fails to disclose all limitations of the claimed subject matter.

A single prior art reference anticipates a patent claim only if it *expressly or inherently describes each and every limitation set forth in the patent claim.* *Trintec Industries, Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). *The identical invention must be shown in as complete detail as is contained in the ... claim.* *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

The claimed subject matter relates to a system and method that transforms constructs of different type-systems, from one domain to another domain. This enables various components in different domains to seamlessly share tasks or encapsulated business oriented information, as per the needs of the specific domain application. To that end, claim 1 recites a system that maps a first construct of a domain to a second construct of another domain, comprising: *a bank that stores at least one of a set of suppress field labels and a set of introduce field labels; and a mapping component that utilizes at least one of a suppress field label and an introduce field label to facilitate mapping the first construct of a domain to the second construct of another domain.* (claims 13, 18, 29, 30 and 31 recite similar features). Charlet *et al.* fails to disclose such claimed aspects.

Charlet *et al.* describes a method of passing data between an XML document and a hierarchical database, both of which have pre-defined matching hierarchical structures. With more specificity, the indexed raw data from an XML document is transferred to the database or vice-versa, using the representations in the metadata schema for validation. The metadata here, consists of the XSD schema of the document and a database schema, thereby allowing the data of one hierarchical structure to be mapped to another hierarchical structure for the sake of transferring data under a categorized head or element name of a sub-tree.

In contrast, the claimed subject matter relates to systems and methods that transform constructs. For example, the systems and methods can be utilized to transform a construct from one domain or space to a construct in another domain or space. For example, a construct in the object domain (*e.g.*, an object oriented based artifact) can be mapped to a construct in the markup domain (*e.g.*, a markup language based artifact) or *vice versa*. In another example, these constructs (object and/or markup) can be transformed to and/or from constructs in the user interface (UI) domain and/or relational domain. Moreover, such transformation can include one or more of the following mappings: transforming a named construct to an anonymous construct; transforming a named construct to a named construct; transforming an anonymous construct to a named construct; and transforming an anonymous construct to an anonymous construct.

Furthermore, structural mismatch when transforming between named and anonymous constructs of different domains is addressed. The schema bank which is utilized to store mediating schema can be employed to generate an intermediate structure when serializing and/or

deserializing constructs. The set(s) of introduce or suppress field labels is utilized to suppress the addition, modification and/or removal of constructs such that the construct can be returned to its structure of the original domain, if desired. (See pg. 3, lines 8-18).

Charlet *et al.* merely discloses the transfer of raw data from an XML document classified under field names to a hierarchical database. Charlet *et al.* does not disclose a system of transforming a construct from one domain or space to a construct in another domain or space, such as, a construct in the object domain (e.g., an object oriented based artifact) mapped to a construct in the markup domain (e.g., a markup language based artifact). Accordingly, Charlet *et al.* is silent with respect to ... *a mapping component that utilizes at least one of a suppress field label and an introduce field label to facilitate mapping the first construct of a domain to the second construct of another domain.*

In view of at least the foregoing it is readily apparent that Charlet *et al.* does not teach the identical subject matter in as complete detail as is contained in independent claims 1, 13, 18, 29, 30 and 31 (and the claims that depend there from). Accordingly, this rejection should be withdrawn.

III. Rejection of Claims 7-8, 10 and 20 Under 35 U.S.C. §103(a)

Claims 7-8, 10 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Charlet, *et al.* (US 2005/0160108) as applied respectively to claims 6 and 19 above, and further in view of Dorsett, Jr. (US 6,658,429). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Charlet *et al.* and Dorsett, Jr. *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Dorsett, Jr. *et al.* does not make up for the aforementioned deficiencies of Charlet *et al.* with respect to independent claims 1 and 18 (which claims 7-8, 10 and 20 respectively depend there from). Thus, the claimed subject matter as recited in claims 7-8, 10 and 20 is not obvious over the combination of Charlet *et al.* and Dorsett, Jr. *et al.*, and withdrawal of this rejection is requested.

IV. Rejection of Claims 11 and 21-23 Under 35 U.S.C. §103(a)

Claims 11 and 21-23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Charlet, *et al.* (US 2005/0160108) as applied respectively to claims 1 and 18 above, and further in view of Russell *et al.* (US 2004/0039964). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Charlet *et al.* and Russell *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Russell *et al.* does not make up for the aforementioned deficiencies of Charlet *et al.* with respect to independent claims 1 and 18 (which claims 11 and 21-23 respectively depend there from). Thus, the claimed subject matter as recited in claims 11 and 21-23 is not obvious over the combination of Charlet *et al.* and Russell *et al.*, and withdrawal of this rejection is requested.

V. Rejection of Claims 9, 17, 24, 25, 27 and 28 Under 35 U.S.C. §103(a)

Claims 9, 17, 24, 25, 27 and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Charlet *et al.* (US 2005/0160108) as applied respectively to claims 6, 13 and 18 above, and further in view of Meltzer *et al.* (US 6,125,391). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Charlet *et al.* and Meltzer *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Meltzer *et al.* does not make up for the aforementioned deficiencies of Charlet *et al.* with respect to independent claims 1, 13 and 18 (which claims 9, 17, 24, 25, 27 and 28 respectively depend there from). Thus, the claimed subject matter as recited in claims 9, 17, 24, 25, 27 and 28 is not obvious over the combination of Charlet *et al.* and Meltzer *et al.*, and withdrawal of this rejection is requested.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP615US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,
AMIN, TUROCY & CALVIN, LLP

/Himanshu S. Amin/
Himanshu S. Amin
Reg. No. 40,894

AMIN, TUROCY & CALVIN, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731